

March 16, 2018

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VIA ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *In the Matter of W. Mansfield Jennings Limited Partnership, and Hargray Communications Group, Inc.*, WC Docket 18-52

Dear Ms. Dortch:

On March 14, 2018, Andrew Rein, Chief Financial Officer; David Armistead, Senior Vice President; and Trey Judy, Director, Hargray Communications Group, Inc. (“Hargray”); and the undersigned met with Nicholas Degani, Senior Counsel, and Jay Schwarz, Wireline Advisor to Chairman Ajit Pai, to discuss Hargray’s pending Application to Transfer ComSouth’s Domestic Section 214 Authority to Hargray.<sup>1</sup>

During the meeting, we highlighted the benefits of the transaction, including increased investment in rural areas and operational efficiencies.<sup>2</sup> Although we continue to believe that the Federal Communications Commission’s (“Commission”) existing rules bolstered by Hargray’s robust internal procedures are sufficient to address any concerns about potential unreasonable allocation of shared costs,<sup>3</sup> Hargray discussed options to address the Commission’s concerns, such as a short-term cap on total operating expenditures for its existing rate of return subsidiaries. Hargray emphasized that any remedy should be simple, easy to audit and narrowly focused to address incentives for unreasonable allocation of shared expenses. Hargray encouraged the Commission not to adopt any remedy that could having unintended consequences of deterring broadband investment and deployment in rural areas or creating any disincentives for further consolidation.

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<sup>1</sup> See *Application to Transfer Control of Domestic 214 Authority*, Application, WC Docket 18-52 (filed Feb. 22, 2018) (“Application”).

<sup>2</sup> See Letter from Rebekah P. Goodheart, counsel to Hargray, to Marlene H. Dortch, Secretary, FCC, WC Docket 18-52 (filed Mar. 1, 2018).

<sup>3</sup> See *id.*

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Please contact me if you have any questions regarding these matters.

Sincerely,

*/s/ Rebekah P. Goodheart*  
Rebekah P. Goodheart

cc: Nicholas Degani  
Jay Schwarz